PLANNING DEPARTMENT

TOWN OF GRAFTON

GRAFTON MEMORIAL MUNICIPAL CENTER
30 PROVIDENCE ROAD
GRAFTON, MASSACHUSETTS 01519
(508) 839-5335 ext 1120 • FAX (508) 839-4602
planningdept@grafton-ma.gov
www.grafton-ma.gov

RECEIVED TOWN CLERK
GRAFTON, MA
2020 JAN 10 PM 3:13

APPLICATION FOR SPECIAL PERMIT

Application No. SP 2020-01/SPA

APPLICANT & PROPERTY OWNER INFORMATION

NAME Resinate, Inc.

STREET 120 Gilboa Street CITY/TOWN Douglas

STATE MA ZIP 01516 TELEPHONE 508-864-8150

NAME OF PROPERTY OWNER (if different from Applicant) JKRP Holdings, LLC

Deed recorded in the Worcester District Registry of Deeds Book 61567 Page 342

SITE INFORMATION:

STREET AND NUMBER 135 Westborough Road

ZONING DISTRICT Office/Light Industrial ASSESSOR'S MAP 013.0-0000-0002.0 LOT #(S) PID 250

LOT SIZE 1.08 FRONTAGE Est 217'

CURRENT USE Retail

PROJECT/PLAN INFORMATION:

PLAN TITLE Resinate, Inc.

PREPARED BY (name/address of PE/Architect) Norman Hill, Land Planning, Inc. 214 Worcester St, Grafton, MA 01536

DATES 12/18/2019

Use for which Special Permit is sought: (refer to § 3.2.3.1 of the Zoning Bylaw - Use Regulation Table):

Section 3.2.3.1 #32 Marijuana Retailer

Cite all appropriate sections of the Zoning By-Law which pertain to this Application, Use and Site:

Sections 1 (General), 3 (Uses), 5 (Special Regulations), 8 Traffic Control

TO THE GRAFTON PLANNING BOARD:

The undersigned, being the APPLICANT named above, hereby applies for a SPECIAL PERMIT to be granted by the Planning Board and certifies that, to the best of APPLICANT'S knowledge and belief, the information contained herein is correct and complete.

Applicant's Signature Peter DeCaro Date: 12/18/2019

Property Owner's Signature (if not Applicant) _____ Date: _____

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EXHIBIT 1a.

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planningdept@grafton-ma.gov
www.grafton-ma.gov

APPLICATION FOR SITE PLAN APPROVAL

Application No. _____

APPLICANT NAME: Resinate, Inc.

STREET 135 Westborough Road CITY/TOWN Grafton

STATE MA ZIP 01536 TELEPHONE 508-864-8150

PROPERTY OWNER NAME: JKRP Holding, LLC

STREET 135 Westborough Road CITY/TOWN Grafton

STATE MA ZIP 01536 TELEPHONE 508-864-8150

Deed recorded in the Worcester District Registry of Deeds Book 61567 Page 342

CONTACT PERSON'S NAME: Peter DeCaro

TELEPHONE 508-864-8150

SITE INFORMATION:

STREET AND NUMBER 135 Westborough Road

ZONING DISTRICT OLI ASSESSOR'S MAP _013.0-0000-0002.0 LOT #(S) PID 250

LOT SIZE __1.08_____ FRONTAGE _EST 217_____

CURRENT USE ____Retail_____

PLAN INFORMATION:

PLAN TITLE _Resinate, Inc._____

PREPARED BY__Norman Hill, Land Planning, Inc. 214 Worcester St, Grafton, MA 01536_____

DATE PREPARED ___12/18/2019_____ REVISION DATE _____

Describe proposed changes / additions: _Restripe Parking Lot, Repair Deck, Repair Rear Egress, Modify retaining wall, Hook up sewer, Renovate space for Marijuana Retailer

TO THE GRAFTON PLANNING BOARD:

The undersigned, being the APPLICANT named above, hereby applies for approval of the above entitled SITE PLAN by the Planning Board and certifies that, to the best of APPLICANT'S knowledge and belief, the information contained herein is correct and complete and that said PLAN conforms with the requirements of the Zoning By-Law of the Town of Grafton.

Applicant's Signature Peter DeCaro Date: 12/18/2019

Property Owner's Signature (if not Applicant) _____ Date: _____

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EXHIBIT 1b.

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TREASURER / COLLECTOR

Certificate of Good Standing

Applicants seeking permits with the Town of Grafton must submit this completed form at the time of application. When all obligations are paid to date, you must attach this "Certificate of Good Standing," with your application. Delinquent bills must be paid in full before the appropriate department accepts your application. Please make arrangements to pay these outstanding bills at the Collector's Office.

Please note: it can take up to three (3) business days to process each request.

Please check all that apply and indicate if permit(s) have been issued.

	Permit Issued? Yes	Permit Issued? No		Permit Issued? Yes	Permit Issued? No
☐ Building – Inspection(s)			☐ Septic System		
☐ Building – Electric			☐ Conservation		
☐ Building – Plumbing			☑ Planning		✓
☐ Board of Health			☐ Other		

Other Permit: _____

Petitioner Name: _____

Petitioner Address: _____

City, State, Zip: _____

Phone: 508 864 8150

Property Owner / Company Name: JKKP Holdings LLC

Property Address: 135 Westboro Rd

City, State, Zip: Grafton, MA 01536

Date:	Current	Delinquent	N/A
Real Estate	✓		
Personal Property			✓
Motor Vehicle Excise			✓
Disposal			✓
General Billing			✓

Beth Schrottman — Treasurer / Collector Name (please print)

Beth Schrottman — Treasurer / Collector Signature

1/10/2020 — Date

Form Revised: 01/22/2014

COPY

EXHIBIT 1c.

12/18/20194:14 PM
Map 13 Lot 2
135 Westboro Road

Kenneth Michael O'Brien, MAA
Grafton Data Collector

ID	Site Address	Owner Name	Owner Address	Town	State	Zip	Book	Page
005.0-0000-0001.0	4 MILLENNIUM DRIVE	WORCESTER BUSINESS DEVELOPMENT C	89 SHREWSBURY STREET SUI	WORCESTER	MA	01604	17040	268
005.0-0000-0001.J	8 MILLENNIUM DRIVE	VALLIANT ENTERPRISES LLC	69 MILK ST, SUITE 110	WESTBOROUGH	MA	01581	57943	270
012.0-0000-0001.0	121 WESTBORO ROAD	BLUE WATER DEVELOPMENT LLC	121 WESTBORO ROAD	N GRAFTON	MA	01536	22784	202
012.0-0000-001.B	124 WESTBORO ROAD	MASS DEVELOPMENT FINANCE AGENCY	99 HIGH ST 11TH FLOOR	BOSTON	MA	02110	57193	195
012.0-0000-0015.0	105 WESTBORO ROAD	ARUSS INVESTMENTS INC	75 SOUTHWEST CUTOFF	WORCESTER	MA	01604	57571	229
012.0-0000-0017.0	131 WESTBORO ROAD	THE BACHAND FAMILY REALTY LLC	7 RAYBURN DRIVE	MILLBURY	MA	01527	55787	70
013.0-0000-0001.0	139 WESTBORO ROAD	WINDOW LOGIC GENERAL CONTRACTOR	31 WHEELER ROAD	N GRAFTON	MA	01536	53227	103
013.0-0000-0002.0	135 WESTBORO ROAD	GRAFTON ISHTAR LLC	208 BRIGHAM HILL ROAD	N GRAFTON	MA	01536	52769	63
013.0-0000-0003.0	137 WESTBORO ROAD	RENZI ANNE	183 SUTTON AVENUE	OXFORD	MA	01540	47902	209
013.0-0000-0004.0	141 WESTBORO ROAD	WINDOW LOGIC GENERAL CONTRACTOR	31 WHEELER ROAD	N GRAFTON	MA	01536	53227	103
013.0-0000-0010.0	136 WESTBORO ROAD	MASS COMMONWEALTH OF	1 ASHBURTON PLACE RM 1610	BOSTON	MA	02108-1518	0	0

Resinate Inc. Abutters list

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PLANNING BOARD

WAIVER REQUEST FORM

for Resinate Inc.

Please select the waivers you are requesting, followed by a brief explanation as to why the waiver is needed:

Site Plan Requirements (Section 1.3.3.3.d.)

☐A Site Plan prepared by a professional architect or registered professional engineer, at a scale of one inch equals forty feet (1" = 40'), or at such other scale as may be necessary to show all detail clearly and accurately. Sheet sizes shall not exceed twenty-four inches by thirty-six inches (24" x 36"), and shall not be less than eleven inches by seventeen inches (11" x 17"). If multiple sheets are used they shall be accompanied by an index sheet showing the entire parcel at an appropriate scale.
Click here to enter text.

☐(1.) Name and address of the person(s) submitting the application;
Click here to enter text.

☐(2.) Name and address of the owner(s) of the subject property(ies), if different;
Click here to enter text.

☐(3.) Present use(s) of the land and description and use(s) of existing building(s) thereon, if any;
Click here to enter text.

☐(4.) Proposed use(s) of the land;
Click here to enter text.

☐(5.) Proposed use(s) of existing buildings, if any;
Click here to enter text.

☐(6.) Description and proposed use(s) of the proposed building(s), if any;
Click here to enter text.

☐(7.) Zoning District(s) in which the parcel is located, including floodplain, if applicable;
Click here to enter text.

☐(8.) Locus Map (scale of 1"=1,000') and north arrow;
Click here to enter text.

☐(9.) Title Block containing: name of the project; applicant; property owner; property address and Assessor's Map/Lot number; date (with revisions); name, address and phone number, and the signature and seal of the professional architect or engineer preparing the plan;
Click here to enter text.

☐(10.) Wetlands, Ponds, Streams, or other water bodies, including all applicable buffer zones;
Click here to enter text.

☒(11.) Ownership of all abutting land and approximate location of buildings, driveways, and parking areas thereon within a maximum distance of two hundred feet (200') of the property lines;
Click here to enter text.

☐(12.) Existing and proposed topography at two-foot (2') elevation intervals;
Click here to enter text.

☐(13.) All property lines of the subject property, and all setbacks of buildings and parking areas from said lines, and existing and proposed easements, if any;
Click here to enter text.

EXHIBIT 1e.

☐(14.) Extent and type of all existing and proposed surfaces (pervious and impervious) on the property, including specific materials;
Click here to enter text.

☐(15.) Lot coverage calculations showing percentage of buildings, percentage of pavement, and percentage of open space/ landscaped areas;
Click here to enter text.

☐(16.) Parking calculations for proposed use(s), including all existing use(s) that will continue to exist on the property, if applicable;
Click here to enter text.

☐(17.) Calculations of the volume of earth material to be removed or filled on the property, and delineation of the location(s) of such activity;
Click here to enter text.

☐(18.) Driveways and driveway openings/entrances;
Click here to enter text.

☐(19.) Parking and loading spaces;
Click here to enter text.

☐(20.) Service areas and all facilities for screening;
Click here to enter text.

☒(21.) Landscaping;
Click here to enter text.

☒(22.) Lighting;
Click here to enter text.

☐(23.) Proposed signs (business, traffic, etc.);
Click here to enter text.

☐(24.) Sewage, refuse and other waste disposal;
Click here to enter text.

☒(25.) Stormwater management facilities (drainage);
Click here to enter text.

☐(26.) All structures and buildings associated with the proposed and existing use(s) on the property;
Click here to enter text.

☒(27.) Exterior storage areas and fences;
Click here to enter text.

☐(28.) Utilities and their exterior appurtenances (e.g., fire connections);
Click here to enter text.

☐(29.) Provisions for dust and erosion control;
Click here to enter text.

☐(30.) Any existing vegetation;
Click here to enter text.

☒Stormwater Management Hydrological Study (Section 1.3.3.3.e.)
A stormwater management hydrological study prepared in accordance with the *Rules and Regulations Governing the Subdivision of Land: Grafton, Massachusetts* (Sections 3.3.3.19 and 4.7.8).
Click here to enter text.

☒Earthwork Calculations (Section 1.3.3.3f.)

A report, if applicable, showing calculations of the volume of earth material to be removed from or delivered to the site, including a description of such removal or fill activity. Depending upon the volume of material to be removed or filled, the Planning Board may require the Applicant to submit additional information (if not submitted in the report) regarding, but not limited to, the following: the hours of fill/removal activity; proposed route(s) of transporting materials to and from the site; and measures for dust and erosion control (both on- and off-site) for the proposed activity.

Click here to enter text.

☐ Written statements from the following:

Click here to enter text.

☐ (1.) The engineer and/or architect preparing the plans indicating that the building(s) and site have been designed to comply with the performance standards set forth in Section 4.2 of the Zoning By-Law.

Click here to enter text.

☐ (2.) The applicant(s) and owner(s) of the property indicating that the building(s) and site will be maintained, and the activities on the site will be conducted in accordance with the performance standards set forth in Section 4.1 of the Zoning By-Law.

Click here to enter text.

☒Traffic Study (Section 8.2)

A traffic study shall be submitted with each application for a subdivision of greater than 20 units, special permit or special permit with site plan review, or where required by the Planning Board, unless otherwise waived by a four-fifths (4/5) vote of the SPGA.

Click here to enter text.

COPY

LAND PLANNING, INC.

Civil Engineers • Land Surveyors • Environmental Consultants

December 26, 2019

EXHIBIT 1f.

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JAN - 2 RECD 2020

PLANNING BOARD
GRAFTON, MA

Town of Grafton Municipal Center
30 Providence Road
Grafton, MA 01519

Attention: Joseph Laydon, Town Planner
Subject: Submission of application for Site Plan and Special Permit
Reference: Resinate Incorporated, proposed dispensary, 135 Westboro Road, Grafton, MA

Dear Joe:

On behalf of our client, Peter DeCaro of Resinate Incorporated, we hereby apply for Site Plan approval and a Special permit for a proposed Dispensary to be located at 135 Westboro Road in Grafton, MA. Please find the following enclosed:

Three full size site plans dated December 18, 2019

Seven 11 x 17-inch size site plans

Three copies of the Traffic Impact Statement dated December 16, 2019

Three copies of Site Plan and Special Permit applications dated December 18, 2019

Three copies of a Project Description/Narrative

A check for the Application fee

A check for the advertising cost

A Certificate of Good Standing

A Certified List of abutters with address labels

Three copies of the completed Waiver Request Form

Three copies of 5.10.3.B report

Regarding this application I offer the following information for your consideration:

a. This property has excellent access and egress. The site has good sight distance in both directions. There are two vehicle entrances. The access driveway circles the building. People can easily and safely walk from their parked car to the building entrances.

b. The existing site has 41 parking spaces, two of which are handicap. Our client plans on repainting the parking stripes and access lanes and entrances as shown on our proposed site plan. All proposed parking spaces are 9 feet wide by 18 feet long. When the restriping is completed, the site will have 55 parking spaces, three of which will be handicap. The site will also have the

214 Worcester Street
North Grafton, MA 01536
Tel: 508-839-9526
Fax: 508-839-9528

167 Hartford Avenue
Bellingham, MA 02019
Tel: 508-966-4130
Fax: 508-966-5054

1115 Main Street
Hanson, MA 02341
Tel: 781-294-4144
Fax: 781-293-4111

potential for twelve additional parking spaces in the future if needed. These twelve "reserve spaces" are shown on the site plan and are located directly behind the existing building.
Regarding noise or glare, we do not anticipate any noise or glare leaving the site other than the noise of the vehicles and the glare from their headlights. The noise and glare will be greatly reduced by the woods to the west of the site and by the existing privacy fence along the easterly lot line. Our client plans to use the existing lights at the site

c. A disposal company will be used to truck trash away from the site. There is no dumpster proposed.
d. Regarding abutters, the MBTA Commuter Rail line is behind the site. There are vacant woods across the street from the site. There is a multifamily building west of the site, but there is a strip of natural woods and brush, about fifty feet wide, which screens the multi-family from this site. There is a house to the east of the site, but there is a privacy fence along that lot line. No new lights are proposed.
e. Our client intends to use the existing sign at the site.
f. The existing building meets all required yard setbacks except for the right sideline. Zoning requires a 35-foot side yard setback. The existing building is 24.1 feet from the right sideline. Please note that no expansion of the building is proposed.
g. The existing building will provide adequately for the proposed uses. The site is zoned Office light industrial. The proposed uses will be compatible with the zoning.
h. The proposed tenants will not have any significant impact on the sewer or water lines. Please note that a new sewer line is being installed now past this building. Our client will connect this building to that new sewer line. He will also install a new water main for a new sprinkler system for the building. The proposed sewer and water mains are shown on our site plan.
i. There are no historical sites, cultural sites or scenic landscapes on or near this site.

Regarding the enclosed waiver request form, we offer the following:

Item 11: We ask for a waiver from item 11. Please see the attached google earth picture which shows the abutting property, buildings, driveways and parking areas within 200 feet of the building.

Item 21: We ask for a waiver from a landscaping plan. Our client is not proposing any landscaping to this existing site.

Item 22: We ask for a waiver from a lighting plan. Our client is not proposing any changes to the existing lighting of the site.

Item 25: We ask for a waiver from providing any stormwater management facilities. Our client is not proposing to add any pavement or other impervious surfaces.

Item 27: We ask for a waiver from item 27 as our client is not proposing any fences or exterior storage areas.

Section 1.3.3.3. e We ask for a waiver from all Stormwater Management regulations because our client is not proposing any additional impervious areas.

Section 1.3.3.3f We ask for a waiver from section 1.3.3.3f as our client is not proposing to remove or deliver any earth to or from the site.

We ask for a waiver from your requirement for us to name all people associated with every entity. Please note that we have provided the names and addresses of all entities and individual shareholders.

We hereby certify that the building and site will be maintained in accordance with Section 4.2 of the Grafton Zoning By-law3s.

We hereby certify that the building and site will be maintained, and the activities on the site will be conducted in accordance with Section 4.1 of the Grafton Zoning By-law3s.

We ask for a waiver from the full requirements of Section 8.2. Please see our enclosed traffic impact statement, which has been reviewed and stamped by Norman G. Hill, P.E. Please note that Norman is a Member of the Institute of Traffic Engineers. The traffic impact statement shows that there will not be an increase in the total daily traffic to the site. This is because the trips per day to the marijuana dispensary closely match the trips per day to the displaced restaurant. However, there will be an increase of 34 trips per hour in the am peak hours to the site, and an increase of 38 trips per hour in the pm peak hours. The site is serviced by Route 30 which is a safe State highway. Please also find enclosed three copies of Mass DOT traffic counts for Route 30, done in 2015.

Please contact me if you require any additional information.

Sincerely,
Land Planning Incorporated

Norman G. Hill, P.E., P.L.S.

COPY

resinate

EXHIBIT 1g.

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PLANNING BOARD
GRAFTON, MA

Project Description/Narrative

Resinate, Inc. is a Massachusetts for-profit Corporation incorporated on April 20, 2018. Resinate is a vertically integrated Cannabis Company. As such, Resinate currently has a Provisional Certificate of Registration (PCR) from the Cannabis Control Commission. Resinate' s Marijuana Cultivation site in Douglas as well as the Medical Marijuana Retail site in Worcester has passed all inspections and is awaiting final approval which should take place at the next Public Meeting in January of 2020.

Pertaining to the site located at 135 Westborough Road in Grafton, Resinate is seeking approval of our Special Permit which would allow us to open an Adult Use Marijuana Retail Storefront. Our full application for the Grafton site has been submitted to the CCC and accepted.

The 135 Westborough Road site has recently been purchased by JKRP Holdings, LLC which is owned and operated by Resinate CEO, Peter DeCaro. The site is 1.08 Acres in size. The facility has approximately 10,000 square feet of space to which approximately 7,500 square feet is currently occupied. Tenants include:

- Pecorino's Wine and Cheese – 1,377 sqf
- Wicked Twisted Pretzel – 3,350 sqf
- Resinate, Inc. – 3,837 sqf
- Available Retail Unoccupied Space – 1,577 sqf

The zone classification is OLI (Office Light Industrial) and the lot falls within the Campus Development Overlay District. The proposed primary use for the facility is Retail/Office.

Resinate has been approved to open an Adult Use Marijuana Retail Establishment by the Board of Selectman in Grafton and awarded a Host Community Agreement.

Regarding the site improvements, currently we are planning to do the following:

1. South (frontage) exterior
    a. Replace Anzio's sign with Resinate signage
    b. Repair retaining wall and reduce footprint
2. West exterior (Pecorino)
    a. Repair back deck
3. North exterior
    a. Repair back stairwell and replace with pressure treated wood
    b. Repair gutters
4. Parking Lot
    a. Re-stripe lot to allow for 54 parking spots to meet zoning requirements
    b. Identify a Reserve Parking Area for future expansion
5. Sewer

a. Connect with incoming town sewer system

Regarding interior improvements, we are currently:

1. Demolishing the previous Anzio's site.
2. Removing outdated equipment
3. Removing outdated wiring
4. Removing unused mechanical, plumbing equipment

We will not change the structural integrity of the site.

Improvements to the site will include:

- Updated electrical systems
- Updated plumbing and mechanical systems

Anticipated hours of operation for retail sales are as follows:

- Mon-Sun: 10 am – 9 pm

We expect to employ up to 10-15 employees at the site.

Operational Plan

Qualifications and Training

Resinate will ensure that all employees hired to work at a Resinate facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

Qualifications

In accordance with 935 CMR 500.030, a candidate for employment as a marijuana establishment agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Resinate will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that Resinate discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent's employment will be terminated, and Resinate will notify the Commission within one (1) business day that the agent is no longer associated with the establishment.

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of Resinate' agents will successfully complete a comprehensive training program that is tailored to the roles

and responsibilities of the agent's job function. Agent training will at least include the Responsible Vendor Program and eight (8) hours of on-going training annually.

On or after January 1, 2020, Resinate managers, and/or employees will have attended and successfully completed a Responsible Vendor Program operated by an education provider accredited by the Commission to provide the annual minimum of two hours of responsible vendor training to marijuana establishment agents. Resinate new, non-administrative employees will complete the Responsible Vendor Program within 90 days of the date they are hired. Resinate managers and employees will then successfully complete the program once every year thereafter.

Resinate will also encourage administrative employees who do not handle or sell marijuana to take the responsible vendor program on a voluntary basis to help ensure compliance. Resinate's records of responsible vendor training program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other state licensing authority upon request.

As part of the Responsible Vendor program, Resinate's agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

1. Marijuana's effect on the human body, including physical effects based on different types of marijuana products and methods of administration, and recognizing the visible signs of impairment;
2. Best practices for diversion prevention and prevention of sales to minors;
3. Compliance with tracking requirements;
4. Acceptable forms of identification, including verification of valid photo identification and medical marijuana registration and confiscation of fraudulent identifications;
5. Such other areas of training determined by the Commission to be included; and
6. Other significant state laws and rules affecting operators, such as:
    - Local and state licensing and enforcement;
    - Incident and notification requirements;
    - Administrative and criminal liability and license sanctions and court sanctions;
    - Waste disposal and health and safety standards;
    - Patrons prohibited from bringing marijuana onto licensed premises;
    - Permitted hours of sale and conduct of establishment;
    - Permitting inspections by state and local licensing and enforcement authorities;
    - Licensee responsibilities for activities occurring within licensed premises;
    - Maintenance of records and privacy issues; and
    - Prohibited purchases and practices.

<u>General Security Overview</u>

Resinate, Inc. ("Resinate") will implement policies and procedures to maintain a secure facility and to prevent diversion or other loss of marijuana products in accordance with 935 CMR 500.110 as set out by the Commission. These policies are intended to protect the general public, employees, and consumers. Resinate will identify each individual seeking entrance into the marijuana establishment to ensure that only individuals who are 21 years or older are allowed access. These policies will also provide for the proper storage and disposal of marijuana products. Resinate will

ensure that all excess marijuana is disposed of safely and will have in place the necessary storage areas and equipment for proper storage of marijuana, included established limited access areas. This equipment will include but is not limited to locked safes or vaults, keys, alarms, and cameras. In addition to these measures, Resinate will ensure that all marijuana products are kept out of plain sight of public places outside of the marijuana establishment. Resinate will also implement policies and procedures for situations following inadvertent diversion or loss of marijuana products. In addition, Resinate will work cohesively with law enforcement authorities and fire services and will share Resinate' security plans, policies, and procedures with those authorities.

Limited Access Areas

Resinate will designate limited access areas by posting clearly visible signs, no smaller than 12" x 12" and which state: "Do Not Enter-Limited Access Area-Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height. Resinate will limit individuals allowed access to these areas to employees, agents, law enforcement, and others authorized by the Commission. Resinate will require all employees to wear employee identification badges at all times while inside the marijuana establishment. Employees of Resinate will escort all visitors, including vendors and contractors, into limited access areas. These visitors will be logged in and out, and Resinate will maintain this log and make it available to the Commission for periodic inspection. Resinate will ensure that all visitor identification badges are collected before visitors leave the premises.

Security and Alarm Requirements

Resinate will implement alarms and other security equipment to prevent and detect potential loss and diversion of marijuana. This equipment will include perimeter alarms at all entrances and exits of Resinate' facility, a failure notification system, a panic alarm connected to local law enforcement, video cameras in all areas that contain marijuana, and 24-hour recordings of all video surveillance to be made available to the Commission upon request. Resinate will ensure that all video footage has a clear date and time stamp, clear still photos can be produced in color, and that the footage can be exported into standard image formats including .jpg, .gif, and .bmp formats. Resinate will store the video footage in a way that precludes loss or alteration of the footage. Resinate will have this security equipment inspected monthly. Access to all surveillance areas will be limited to employees who are essential to Resinate' security operations, including local law enforcement.

Incident Reporting

Resinate will immediately notify law enforcement authorities of any security breach including, but not limited to, discovery of discrepancies identified during inventory, diversion or loss of marijuana products, any loss or unauthorized alteration of records related to marijuana, suspicious actions within the marijuana establishment, failure of an alarm system, activation of an alarm system, or any criminal acts. Resinate will provide written notice to the Commission within ten calendar days of any incident that occurs on the premises. Resinate will maintain records and documentation of any security incident for at least one year.

Prevention of Diversion

Resinate, Inc. 's operating policies and procedures ensure prevention of diversion, theft, and illegal or unauthorized conduct pursuant to the Commission's Adult Use of Marijuana regulations codified in 935 CMR 500. Considerations regarding diversion prevention measures include, but are not limited to, marijuana establishment agent and consumer accountability, and identifying, recording, and reporting diversion, theft, or loss. Marijuana in the process of transport, analysis, or retail sale is to be stored and tracked in a manner that prevents diversion, theft, or loss.

More specifically, diversion measures include policies and procedures requiring that:

- Identification is verified on the premises to ensure that only individuals 21 years or older are permitted in Resinate' adult-use marijuana establishment.
- Providing samples or giving away marijuana to consumers is prohibited.
- Employees are made aware of crime prevention techniques pursuant to 935 CMR 500.105(1)(b).
- Any marijuana establishment agent who has diverted marijuana is immediately dismissed, and this is reported to law enforcement and to the Commission pursuant to 935 CMR 500.105(1)(l).
- All employees involved in the handling and sale of marijuana for adult use complete a responsible vendor training program with a curriculum covering diversion prevention and prevention of sales to minors and comply with all other marijuana establishment agent training requirements under 935 CMR 500.105(2).
- Display samples of each product offered for sale are displayed in secure, locked cases, subject to the requirements of 935 CMR 500.110.
- Resinate only engages in reasonable marketing, advertising, and branding practices that do not promote the diversion of marijuana and comply with all other marketing and advertising requirements under 935 CMR 500.105(4).
- Warning statements required by the Commission's regulations are affixed to all applicable products, and that Resinate' labels comply with all other labeling of marijuana and marijuana products requirements under 935 CMR 500.105(5).
- Tamper or child-resistant packaging is used for applicable marijuana products, and that Resinate' products comply with all other packaging of marijuana and marijuana products requirements under 935 CMR 500.105(6).
- Resinate maintain real-time inventory, and tracking and tagging all marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.
- Records are kept for inventory, seed-to-sale tracking for all marijuana products, personnel (including documentation of the completion of required training), and waste disposal, and that Resinate comply with all other record keeping requirements under 935 CMR 500.105(9).
- Marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, is stored in a separate area, until such products are destroyed; and that Resinate comply with all other storage requirements under 935 CMR 500.105(11).
- Two or more marijuana establishment agents witness and document how the marijuana waste is disposed or otherwise handled, and that Resinate comply with all other waste disposal requirements under 935 CMR 500.105(12).

- All transported marijuana products that are accepted by the Marijuana Retail facility are linked to the seed-to-sale tracking program, that all vehicles transporting marijuana to the Marijuana Retail facility are staffed with a minimum of two marijuana establishment agents, and that any vehicle accidents, diversions, or other reportable incidents that occur during transport are reported to the Commission and law enforcement within 24 hours, and that Resinate only accept transported marijuana product shipments that comply with all other transportation requirements under 935 CMR 500.105(13).
- All security requirements under 935 CMR 500.110 are followed, including:
    - Implementing sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana at Resinate' adult-use marijuana retail location;
    - Adopting procedures to prevent loitering and to ensure that only individuals engaging in activity expressly or by necessary implication permitted by the Commission's regulations and its enabling statute are allowed to remain on the premises;
    - Storing all finished marijuana products in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss;
    - Restricting access to employees, agents or volunteers specifically permitted by Resinate, agents of the Commission, state and local law enforcement and emergency personnel, and all other limited access areas requirements under 935 CMR 500.110(4);
    - Implementing an adequate security system to prevent and detect diversion, theft or loss of marijuana, notifying law enforcement and the Commission within 24 hours of a diversion, theft or loss of any marijuana product, and all other security and alarm requirements under 935 CMR 500.110(5); and
    - Obtaining, at Resinate' own expense, a security system audit by a vendor approved by the Commission, and all other security audits requirements under 935 CMR 500.110(8).
- All other operating requirements for retail sale under 935 CMR 500.140 are followed, including:
    - Limiting sales to one ounce of marijuana or five grams of marijuana concentrate to a consumer per transaction;
    - Utilization of a point-of-sale (POS) system approved by the Commission, in consultation with the DOR;
    - Providing educational materials to consumers stating that they may not sell marijuana to any other individual and which include information regarding penalties for possession and distribution of marijuana in violation of Massachusetts law.

Storage of Marijuana

Resinate, Inc. ("Resinate") will ensure that all marijuana and marijuana products are stored in compliance with 935 CMR 500.105(11). Specifically, Resinate will ensure the following:

- The facility will have adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110;

- The facility will have separate areas for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed, in accordance with applicable provision of 935 CMR 500.105(12);
- All storage areas will be maintained in a clean and orderly condition;
- All storage areas will be free from infestation by insects, rodents, birds, and pests of any kind; and
- All storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

Per the requirements of 935 CMR 500.110, all finished marijuana products will be stored in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss. Furthermore, all safes, vaults, and any other equipment or areas used for the storage of marijuana products will be securely locked and protected from entry, except for the actual time required to remove or replace marijuana.

The storage of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers, per the requirements of 935 CMR 500.105(3)(b)(15).

In accordance with 935 CMR 500.105(3)(c), Resinate will comply with sanitary requirements. All edible products will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

Inventory Procedures

Resinate, Inc. ("Resinate") will maintain real-time inventory in compliance with 935 CMR 500.105(8), including maintaining inventory of marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal. All marijuana plants and marijuana products will be tagged and tracked within Resinate' seed-to-sale tracking system.

Resinate utilizes a real-time seed-to-sale tracking system, ERP SAP system, which will provide the electronic tracking of individual marijuana plants, including during final sale. Resinate' tracking system will utilize unique batch identification numbers to accurately track inventory.

Resinate will:

- Establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of finished and stored marijuana products;
- Conduct a monthly inventory of finished and stored marijuana;
- Conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and
- Promptly transcribe inventories if taken by use of an oral recording device.

The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. All inventory records will be kept in accordance with Resinate' record keeping procedures. Resinate' agent's will document and Resinate will report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours after the discovery of such a discrepancy.

Resinate will only sell and market inventory that is capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.